



OFFICE OF CHIEF COUNSEL FOR ADVOCACY

U.S. SMALL BUSINESS ADMINISTRATION
WASHINGTON, D.C. 20416

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF GENERAL COUNSEL

September 27, 1996

BY HAND

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, Room 222
Washington, D.C. 20554

Re: GN Docket 96-113

Dear Mr. Caton:

The Office of Advocacy of the Small Business Administration transmits herewith the original and 10 copies of its comments in response to the Notice of Proposed Rulemaking in the above-referenced docket. Included with this package is a duplicate "file copy" of this pleading. Please date stamp this copy and return it to the messenger delivering this filing.

Thank you in advance for your assistance in this matter. If you have any questions, please contact me or David Zesiger at 202/205-6532.

Respectfully submitted,

Jere W. Glover
Chief Counsel

Enclosures

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of)
)
Section 257 Proceeding to) GN Docket No. 96-113
Identify and Eliminate)
Market Entry Barriers)
for Small Businesses)

To: The Commission

COMMENTS OF THE CHIEF COUNSEL
FOR ADVOCACY OF THE UNITED STATES
SMALL BUSINESS ADMINISTRATION

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September 27, 1996





U.S. SMALL BUSINESS ADMINISTRATION
WASHINGTON, D.C. 20416

OFFICE OF CHIEF COUNSEL FOR ADVOCACY

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To: The Commission		

**COMMENTS OF THE CHIEF COUNSEL
FOR ADVOCACY OF THE UNITED STATES
SMALL BUSINESS ADMINISTRATION**

The Office of Advocacy of the Small Business Administration hereby submits its comments in the Commission's proceeding to identify and eliminate market entry barriers to small businesses in the various telecommunications markets. The Commission's proceeding is designed to implement the provisions of Section 257 of the Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56 (1996)("the 1996 Act").

The Office of Advocacy was formed in 1976 to serve as a voice for small business within the federal government. Its statutory duties include serving as a focal point for



complaints concerning the federal government's small business policies, representing the views of small business before other federal agencies, developing proposals for changes in any agency's policies and communicating such proposals to the appropriate agencies. 15 U.S.C. 634c(1)-(4).

THE SCOPE OF SECTION 257

With the passage of the 1996 Act, Congress began the process of unlocking the doors of many telecommunications markets that have long dominated by monopolies. The 1996 Act lays the foundation for an entire new set of rules that will allow competitors to enter and compete in these markets.

In the broadest sense, Section 257 simply applies the overall intent of the 1996 Act specifically to small businesses. The purpose of Section 257 is manifestly simple: identify and eliminate market entry barriers for small businesses. This unmistakable mandate will be the sole and sufficient measure of the Commission's success in this docket.

Both the language and the intent of Section 257 mandate a broad scope for this proceeding. Clearly, unless the express language of Section 257 is to be rendered a nullity, it must be assumed that Congress intended a broad inquiry and equally broad remedial action. Section 257(b) casts the purposes of Section 257 in the broadest sense: "favoring diversity of media voices, vigorous economic competition, technological advancement, and promotion of

the public interest, convenience, and necessity."¹ These purposes are consonant with the overall thrust of the Telecommunications Act -- opening markets to competition and eliminating outmoded regulation. The changes made in this proceeding both in marketplace dynamics and in the Commission's regulations will do much to advance these broader goals.

TYPES OF MARKET ENTRY BARRIERS

It is significant to note that the statute places virtually no restriction on the Commission's discretion. More specifically, Section 257 does not define or limit the term "market entry barriers." It places no type of barrier off-limits. The Notice makes a good beginning in listing a number of issues that typically plague small businesses - particularly access to capital issues. But at best, many of these problems are susceptible to amelioration, rarely elimination. The Office of Advocacy recommends the Commission address these as aggressively as possible. But it should not lose sight of the types of barriers that the Commission can change or eliminate with a stroke of a word processor - its own regulations. This proceeding must not just eliminate market barriers in the marketplace. It must also eliminate such barriers in the Commission's own rules.

Systemic Vs. Service Specific Barriers

Market entry barriers that are created by the Commission's own rules fall into two categories: systemic barriers and service specific barriers. Both types of barriers need to be addressed. Systemic barriers affect small businesses across a number of industries. The

¹The 1996 Act, Section 257(b).

Commission's various complaint procedures are an example of rules that, while on their face seem neutral, in their application tend to keep small complainants from competing with larger companies on an equal basis. The Commission has begun to reexamine its complaint procedures in certain areas to fulfill various mandates of the 1996 Act but a more comprehensive overhaul is necessary -- and should be part of this proceeding.

Service-specific barriers must also be addressed. Commenters have already focused on a number of these and we will hear about more today. This may appear to be a Herculean task but it is one that must be undertaken one barrier at a time. If this is not at least attempted, there will be little to show for this docket.

In practice, there is not a single bureau that could not profitably examine its rules for such barriers. There is not a single bureau that could honestly contend that its rules contain no such barriers. Small businesses in each industry are more than ready to help in such a search. If this proceeding caused each Bureau to undertake such an examination of its own rules, this docket would be an unqualified success. The Office of Advocacy strongly encourages this or a similar initiative in this docket.

Gender and Racial Barriers

Beyond all these barriers, women and minorities also face an entirely different set of market entry barriers that result in a disproportionately low rate of ownership and participation in virtually every telecommunications field. Section 257's clear call for an

improvement in the "diversity of media voices" makes it essential for the Commission to address these barriers in the instant proceeding as well.

The Commission has tackled gender- and race-based barriers head-on in its Notice and the Office of Advocacy strongly encourages the Commission to take concrete steps to improve women and minorities' opportunities in this industry. Improving access to capital for these firms is certainly the single most important step the Commission could take. Any steps the Commission takes would be consistent with the SBA's longstanding efforts to improve minorities and women's access to capital in all industries.

SMALL BUSINESS' ROLE IN TELECOMMUNICATIONS

Section 257's insistence on eliminating market entry barriers is effectively a mandate for small businesses to play an increasingly broad role within the telecommunications industry. Prior to any examination of actual market barriers, it is first necessary to examine the role small businesses currently play in the telecommunications marketplace.

The Notice requests the submission of "profile data" about small telecommunications businesses.² Clearly, identifying market entry barriers to small telecommunications businesses requires an examination of the role small businesses play in the various segments of the telecommunications field. Telecommunications has long been one of the most concentrated industries of the U.S. and other industrialized economies. Large portions of the

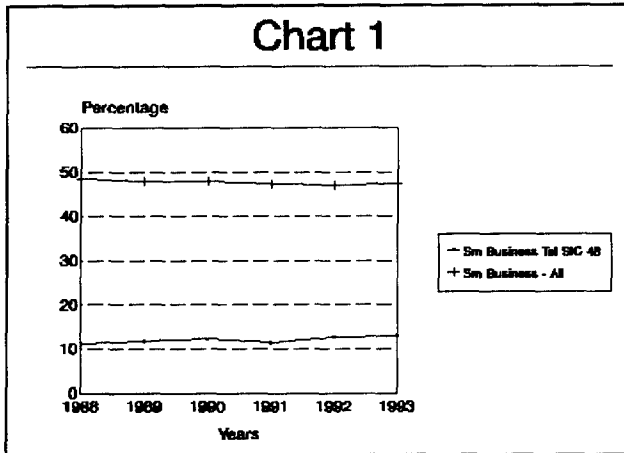
²Notice at ¶ 24.

industry were traditionally regulated as a natural monopoly, a situation that has only really changed with the recent passage of the Telecommunications Act of 1996. To date, however, there has been little attempt to quantify the role small businesses play in this industry. Such a statistical foundation is a necessary predicate to remedial action the Commission may take pursuant to Section 257.

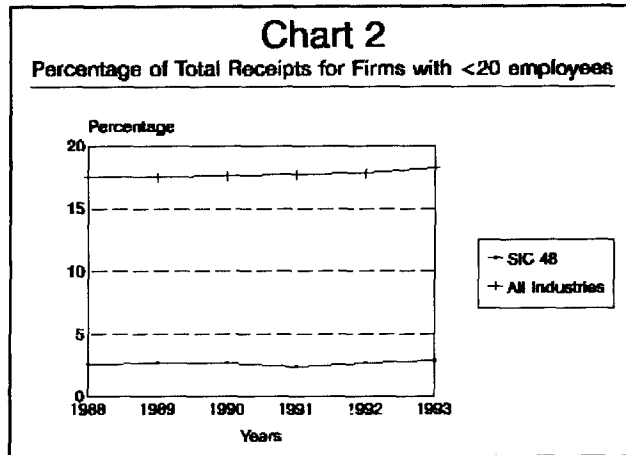
SBA statistics concerning the distribution of firms in the telecommunications industry underscore large firms' domination of the industry.³ The largest telecommunications firms (those with over 500 employees) accounted for 87.0% of the telecommunications market in 1993, the most recent year for which SBA data are available. This represents a significantly greater share of estimated receipts than the 52.6% share that businesses with over 500 employees account for in the total U.S. economy. Conversely, the remaining smaller businesses (firms with under 500 employees) account for only 13.0% of the telecommunications market versus 47.4% of the U.S. economy overall (see Chart 1 below and Table I, Appendix A).⁴

³The SBA has been supplied by the Census Bureau with comprehensive statistics on economic activity across all industries according to standard industrial classification codes. The assertions made in this submission are based on these data unless otherwise indicated.

⁴The 500 employee threshold is a threshold used by the Census Bureau in all industries. The Office of Advocacy considers this only one relevant measure of small business activity in the telecommunications industry. This does not prejudice the issue of what the Commission considers to be a small business for this proceeding which is addressed more directly below.



The differences are equally dramatic when market share for smaller firms is examined. In 1993, businesses with under 20 employees accounted for 17.5% of the U.S. economy overall, whereas similarly-sized telecommunications businesses accounted for only 2.9% of the telecommunications industry (see Chart 2 below and Table I, Appendix A).



While small telecommunications firms account for a disproportionately small share of the telecommunications industry when compared with small firms' share of the economy overall, it is also important to note that the trends in the two sets of statistics are headed in opposite directions. Chart 1 illustrates this point clearly. Small firms' share of receipts in the economy overall declined in both the under 500 employee category (48.5% in 1988 to 47.4% in 1993) and the under 20 employee category (18.3% in 1988 to 17.5% in 1993).

The opposite was true for small telecommunications firms. Small telecommunications firms' share of receipts increased in both the under 500 employee category (from 11.2% in 1988 to 13.0% in 1993) and the under 20 employee category (2.5% in 1988 to 2.9% in

1993). Moreover, these market share increases came in a dynamically growing industry. There are probably several reasons for this upward trend, including the low market share with which small telecommunications firms began this period and the gradual opening of telecommunications markets to competition over this same period of time.

The progress made by smaller telecommunications businesses in recent years is more clearly illustrated by looking at estimated receipts for these firms. Estimated revenues for smaller telecommunications businesses increased from \$24.1 billion in 1988 to \$31.5 billion in 1993, more than a 30% increase (see Table II, Appendix A). Of course, this evidence of the inherent strength of the small business sector of the telecommunications industry exists, in spite of a wide range of market entry barriers that are the subject of this proceeding. It also suggest the likely result of any significant lifting of these barriers.

The Census Bureau data also provides data down to the "four-digit" SIC code level. Table I details the various trends in each of these sectors of the overall telecommunications industry (see Appendix A). Results vary more widely in these data given the particular experience of each sector. Some reference to these data are useful in identifying potential barriers to small telecommunications businesses.

SECTOR-SPECIFIC INFORMATION

The most notable four-digit industry code is that for all common carriers and related providers (SIC 4813). Market share for smaller businesses employing under 500 employees

was flat except for the final year of data. Smaller entity market share was 4.6% in 1988 as well as in 1992 (see Table I, Appendix A). The number actually declined in the interim years. Only in 1993 did the market share move up to 5.5%. More data would be necessary to confirm this one year change as a significant trend.

There are two areas in which small business' market share actually decreased between 1988-1993: Cable television and wireless communications. Small business' market share in the cable television industry declined from 23.7% in 1988 to 22.5% in 1993 (see Table I, Appendix A). While this is not a dramatic decline, any decline in a growing industry is cause for concern and should attract the Commission's attention in this docket. This evidences the current trends of consolidation that have typified by the cable industry in recent years and argues for particular remedial effort by the Commission in this proceeding.

Market share for small businesses in wireless communications experienced the greatest decline of any segment of the industry. Whereas smaller business' accounted for 38.2% of the market for mobile communications in 1988, their market share dropped to only 23.7% in 1993 (see Table I, Appendix A). Receipts for smaller wireless businesses, however, increased in the same time period from \$23.0 billion in 1990 to \$3.6 billion in 1993, a healthy 56% rate of growth. Some of this dramatic drop can be accounted for by both the consolidation in this industry and the introduction of mass market mobile services (particularly cellular telephony). However, with such a significant drop in market share it is nonetheless clear that the Commission should be particularly attentive to market entry barriers

in this market segment.

SMALL BUSINESS SIZE STANDARD DEFINITION

The Commission requests comment on the question of how it should define small businesses for the purposes of Section 257.⁵ The first question that arises in this context is that of the Commission's authority to establish definitions of small businesses in this proceeding. Section 632(a)(2)(C) of the Small Business Act states, "Unless specifically authorized by statute, no Federal department or agency may prescribe a size standard for categorizing a business concern as a small business concern, unless such proposed size standard ... is approved by the [SBA] Administrator." 15 U.S.C. 632(a)(2)(C) Whereas other sections of the 1996 Act authorize specific definitions of a small business size standard, Section 257 is silent on this question. Therefore, any definition the Commission may develop apart from existing size standards set by the SBA must be approved by the SBA Administrator.⁶

It is not clear why the Commission should consider it necessary to redefine small business size standards for this proceeding. The Commission is aware of the number of size standards that are already in place for small telecommunications businesses of all types. It is

⁵Notice at ¶ 40.

⁶The SBA's regulations specify the procedure for agencies seeking approval of new size standard definitions. See 13 C.F.R. 121.902(b). The comments made herein by the Office of Advocacy should not be construed as approval by the Administrator of any size standard definitions the Commission may propose in this proceeding.

not clear why these existing definitions, which have served small businesses well in a wide variety of situations, should be jettisoned for the purposes of this one proceeding. To do so would also entail a significant diversion of time and resources that would be better spent actually removing barriers.

The Notice requests comment on whether it should adopt a general size standard or specific standards for particular services. It is virtually impossible to develop a single definition of small business given the diversity inherent in the telecommunications industry. The proliferation of definitions the Commission itself has developed with the SBA for various services testifies to this difficulty. Anything like a single definition would almost certainly distort the Commission's analysis for some sectors of the telecommunications industry and lead to inappropriate rule changes for some small businesses. A single definition would also be contrary to the intent of the Small Business Act which specifies that the Administrator is to make a "detailed definition" and that definitions "shall vary from industry to industry to the extent necessary to reflect differing characteristics of such industries..." 15 U.S.C. § 632(a).

SMALL BUSINESS ACCESS TO COMMISSION PROCESSES

Lack of information and access to the Commission's decision making processes act s as one of the chief impediments to small business' ability to challenge and eliminate market entry barriers where many are developed -- as a result of Commission rulemakings. The Office of Advocacy recommends making all filings submitted to the Commission electronically accessible to all parties. This would greatly facilitate small business' access to

the Commission's processes. Electronic dissemination of information by the government was one of the overarching priorities of the White House Conference on Small Business in 1995 which appeared in several of the top recommendations made by the Conference. The Commission has been one of the most forward-thinking among federal agencies in using its world wide web site to communicate with its constituency. In certain instances the Commission has even put a number of filings on its web site. Ultimately, however, all filings need to be readily accessible if small telecommunications firms are to have the access they need to Commission processes.

COMPLAINT PROCEDURES

The Commission's complaint procedures pose significant difficulties for small telecommunications entities and represent one of the chief barriers small businesses face in entering and competing on an even footing with larger corporations. This is particularly true for small common carriers whose only recourse to market barriers imposed by larger incumbent monopolies is to file a complaint with the Commission or the states. The Commission has developed a series of complaint procedures for different services it regulates and is developing more procedures in response to the mandates of the 1996 Act.

The chief procedure for processing complaints against common carriers is a good example of how the system typically obstructs smaller telecommunications firms' ability to compete.⁷ Smaller competitors' complaints are rarely resolved in a timely manner, if at all.

⁷See 47 C.F.R. §§ 1.701, *et. seq.*

The number of adjudicated resolutions of complaints over the past ten years is minuscule. In this context, justice delayed is justice denied. Marketplace realities move too quickly for competitors to wait for a resolution that may effectively never arrive.

The provisions of the 1996 Act that address complaint procedures collectively work a revolution in how complaints should be handled generally at the Commission. They create hard deadlines where few existed before. The deadlines range from 120 days to as low as 60 days for a cease and desist order under sections 260 and 275. The 1996 Act also effectively reverses the burden of proof in certain situations, imposing an obligation on the incumbent carrier to substantiate its conduct. The Commission has already begun to implement these requirements in the telemessaging, interconnection and BOC out-of-region proceedings.

What is needed, however, is a more comprehensive overhaul of all of the Commission's complaint procedures. The Commission may be near to initiating a broader rulemaking on complaint processes generally. The Office of Advocacy recommends that the instant proceeding include a focus on this vital issue regardless of the activities in other proceedings where the concerns of small business are less likely to be heard.

COMPLIANCE WITH REGULATORY FLEXIBILITY ACT

While the Commission has generally done a commendable job complying with the revised Regulatory Flexibility Act requirements, there are several issues that could profitably be addressed in this proceeding. The Common Carrier Bureau's apparent insistence on

deeming all local exchange companies as "dominant in their field of operation" and therefore not small businesses for the purposes of the Regulatory Flexibility Act significantly impedes small local exchange companies' ability to represent their interests at the Commission and to eliminate or avoid market entry barriers in the Commission's rules.

The Common Carrier Bureau acts differently than virtually the entire remainder of the Commission in this regard. The Office of Advocacy is not aware of a single instance of any other bureau of the Commission attempting to set its own definition of a small business without consulting with this Office as required by statute. This Office is also not aware of another instance where the Commission has defined small business directly in conflict with an existing SBA size standard definition.

The Common Carrier Bureau's defense of its position appeared most recently in the final regulatory flexibility analysis for the Report and Order in CC Docket No. 96-98.⁸ This defense interprets the statutory phrase "dominant in its field of operation" in a manner irreconcilably opposed to the SBA's interpretation as contained in its rules.⁹

The Office of Advocacy proposes that the instant proceeding establish an explicit

⁸Even though the First Report and Order analyzed the impact of the new rules on small local exchange companies, it is clear from the First Report and Order's discussion that the Common Carrier Bureau did not believe it was required to and did not intend to do so in other rulemakings. See First Report and Order at ¶¶ 1328-1330.

⁹13 C.F.R. §102(b).

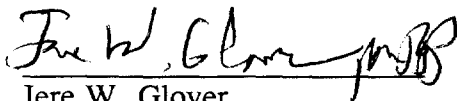
policy concerning the regulatory flexibility status of small local exchange companies. This Office recommends that the existing size standard definition for local exchange companies (1,500 employees) be employed for regulatory flexibility purposes. This would be a significant step toward empowering small local exchange companies to eliminate or avoid altogether market entry barriers that are contained within the Commission's rules.

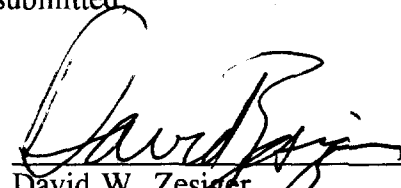
CONCLUSION

Section 257's mandate for the elimination of market entry barriers offers the Commission an opportunity to take meaningful steps in freeing smaller entities from the multitude of barriers they face in attempting to compete in the telecommunications marketplace.

Small businesses have traditionally generated a disproportionate share of innovation and job creation in the U.S. economy. This is even true in the telecommunications industry where small firms' contributions have long been suppressed by the monopoly status of many market segments. By knocking down barriers in the marketplace and at the Commission, the Commission can do much to achieve these statutory goals. The mandate of Section 257 is an unusual and important opportunity for the Commission to create opportunity and greater competition in the telecommunications field.

Respectfully submitted,


Jere W. Glover
Chief Counsel


David W. Zesiger
Assistant Chief Counsel

APPENDIX A

TABLE I**RECEIPTS BY SELECTED FIRM SIZES, 1988 – 1993****UNITED STATES TOTAL**

	<u>Total</u> <u>(\$ bill.)*</u>	<u>< 20</u>	<u>Percent</u>		<u>Firms</u>	<u>Establishments</u>
			<u>< 500</u>	<u>> 500</u>		
1993	14,098.6	17.5	47.4	52.6	5,193,642	6,401,233
1992	13,605.2	17.5	47.0	53.0	5,095,356	6,319,300
1991	12,961.4	17.6	47.2	52.8	5,051,025	6,200,859
1990	12,714.3	17.7	47.9	52.2	5,073,795	6,175,559
1989	12,025.2	17.8	47.9	52.1	**	6,106,922
1988	11,231.8	18.3	48.5	51.5	**	6,016,367

* Receipts data estimated.

** Firm data not available prior to 1990.

MAJOR GROUP 48 – COMMUNICATIONS

	<u>Total</u> <u>(\$ bill.)*</u>	<u>< 20</u>	<u>Percent</u>		<u>Firms</u>	<u>Establishments</u>
			<u>< 500</u>	<u>> 500</u>		
1993	241.7	2.9	13.0	87.0	15,022	40,888
1992	235.0	2.7	12.7	87.3	14,062	40,337
1991	234.7	2.4	11.5	88.5	13,148	39,306
1990	229.2	2.7	12.2	87.8	13,742	35,643
1989	215.8	2.7	11.7	88.3	**	35,495
1988	215.5	2.5	11.2	88.8	**	33,187

* Receipts data estimated.

** Firm data not available prior to 1990.

SIC 4812, Radiotelephone Communications

	<u>Total</u> <u>(\$ bill.)*</u>	<u>< 20</u>	<u>Percent</u>		<u>Firms</u>	<u>Establishments</u>
			<u>< 500</u>	<u>> 500</u>		
1993	15.5	6.1	23.7	76.3	1,659	3,466
1992	12.2	7.5	27.2	72.8	1,436	3,019
1991	9.8	7.2	31.9	68.1	1,224	2,516
1990	6.5	7.1	35.2	64.8	893	1,663
1989	5.2	7.3	35.5	64.6	**	1,454
1988	4.1	9.2	38.2	61.8	**	1,214

* Receipts data estimated.

** Firm data not available prior to 1990.

SIC 4813, Telephone Communications, Except Radiotelephone

	<u>Total</u> <u>(\$ bill.)*</u>	<u>< 20</u>	<u>Percent</u>		<u>Firms</u>	<u>Establishments</u>
			<u>< 500</u>	<u>> 500</u>		
1993	164.1	1.4	5.5	94.5	2,986	21,523
1992	160.8	1.2	4.6	95.4	2,359	21,234
1991	164.5	1.0	4.2	95.8	2,139	21,268
1990	136.5	1.2	4.9	95.2	2,128	16,655
1989	128.9	1.2	4.8	95.2	**	16,663
1988	129.2	1.3	4.6	95.4	**	15,476

* Receipts data estimated.

** Firm data not available prior to 1990.

SIC 4822, Telegraph & Other Communications

	<u>Total</u> <u>(\$ bill.)*</u>	<u>< 20</u>	<u>Percent</u>		<u>Firms</u>	<u>Establishments</u>
			<u>< 500</u>	<u>> 500</u>		
1993	1.2	14.8	39.8	60.2	327	526
1992	1.5	7.5	23.2	76.8	260	501
1991	1.5	6.1	14.6	85.4	206	526
1990	2.5	4.5	16.3	83.8	238	578
1989	2.6	4.3	15.0	85.1	**	975
1988	2.6	5.7	18.9	81.6	**	1,150

* Receipts data estimated.

** Firm data not available prior to 1990.

SIC 4832, Radio Broadcasting Stations

	<u>Total</u> <u>(\$ bill.)*</u>	<u>< 20</u>	<u>Percent</u>		<u>Firms</u>	<u>Establishments</u>
			<u>< 500</u>	<u>> 500</u>		
1993	7.2	13.8	71.0	29.0	5,419	6,632
1992	8.0	11.4	64.2	35.8	4,976	6,327
1991	7.6	11.7	61.0	39.0	4,490	6,199
1990	7.5	11.3	60.0	40.0	4,653	5,514
1989	7.3	12.1	60.0	40.0	**	5,746
1988	7.0	14.2	66.7	32.3	**	6,085

* Receipts data estimated.

** Firm data not available prior to 1990.

SIC 4833, Television Broadcasting Stations

	<u>Total</u> <u>(\$ bill.)*</u>	<u>< 20</u>	<u>Percent</u>		<u>Firms</u>	<u>Establishments</u>
			<u>< 500</u>	<u>> 500</u>		
1993	20.8	1.9	22.3	77.5	964	1,580
1992	19.2	1.2	21.2	78.7	833	1,464
1991	18.5	1.4	21.6	78.4	838	1,443
1990	18.0	1.2	21.2	78.8	775	1,269
1989	17.2	1.2	20.2	79.9	**	1,234
1988	17.0	1.0	29.5	80.7	**	1,238

* Receipts data estimated.

** Firm data not available prior to 1990.

SIC 4841, Cable & Other Pay Television Services

	<u>Total</u> <u>(\$ bill.)*</u>	<u>< 20</u>	<u>Percent</u>		<u>Firms</u>	<u>Establishments</u>
			<u>< 500</u>	<u>> 500</u>		
1993	28.9	4.3	22.5	77.5	1,866	4,469
1992	27.7	4.1	24.7	75.3	1,673	4,317
1991	26.1	4.3	21.9	78.1	1,665	4,201
1990	24.2	4.3	23.8	76.3	1,439	3,530
1989	20.5	4.9	24.9	75.2	**	3,575
1988	17.8	6.4	28.7	71.6	**	3,657

* Receipts data estimated.

** Firm data not available prior to 1990.

SIC 4899, Communications Services, NEC

	<u>Total</u> <u>(\$ bill.)*</u>	<u>< 20</u>	<u>Percent</u>		<u>Firms</u>	<u>Establishments</u>
			<u>< 500</u>	<u>> 500</u>		
1993	3.2	16.6	49.2	50.8	934	1,100
1992	4.7	12.1	36.4	63.9	1,042	1,341
1991	5.7	6.4	23.2	76.9	852	1,385
1990	6.3	7.5	30.3	69.5	751	1,320
1989	5.7	6.8	26.2	73.8	**	1,172
1988	5.1	5.3	26.6	73.3	**	981

* Receipts data estimated.

** Firm data not available prior to 1990.

SOURCE: Adapted by the U. S. Small Business Administration, Office of Advocacy, based on data provided by the U. S. Department of Commerce, Bureau of the Census.

TABLE II

MAJOR GROUP 48 – COMMUNICATIONS

	Firm Employment Size –		
	<u>Total</u>	<u>< 20</u>	<u>< 500</u>
1993	\$241.7	\$6.2	\$31.5
1992	235.0	6.9	29.7
1991	234.7	5.6	26.9
1990	229.2	6.2	28.0
1989	215.8	5.7	25.3
1988	215.5	5.5	24.1

* Receipts data are in billions of dollars
and are estimated by Bureau of Census.